

## Comment on Petition RM-11305

Petition RM-11305 is simply a self-serving request by a very small group of licensed radio amateurs who have self-anointed themselves as the “Communications Think Tank”. These people want to be able to splatter their wide-band AM signals anywhere on the amateur radio service frequencies and therefore want to see the regulations restricting various modes to certain bandwidths abolished. I think it goes without saying that any notion of voluntary bandplans would be anathema to the “Think Tank”, though they lay the responsibility of enforcing them at the ARRL’s doorstep through the Official Observer program.

What follows are the reasons I would like the FCC to deny RM-11305:

1) The experimentalist nature of the hobby survives and even thrives to this day in the building and operation of QRP rigs which mostly operate CW at five watts or less. Thanks to the narrow bandwidth of a CW signal, the small CW only portions of the various bands, and the regulations that prohibit the 1500 watt AM crowd from transmitting on whatever frequency they please, QRP is alive and well. Thousands of amateur radio service licensees young and old enjoy the learning experience of building and operating their own equipment either from a kit or from scratch for a very modest financial outlay. If the 1500 watt AM crowd is allowed to splatter their signals wherever they want QRP will become virtually extinct. QRP CW does an admirable job of living up to the spirit of the regulation requiring the minimum amount of transmit power required to make and complete an individual contact. QRP also uses minimal bandwidth to make contacts and keeps alive the experimentalist nature of the hobby along with fostering an increase in electronics study and information among the population. It is irrational and unreasonable to suppose that a QRP contact that was being interfered with by a high power AM transmission would be able to point this out to the offender.

2) The “Think Tank” claims that portions of the bands are underutilized, e.g. the Novice Sub-bands. This simply isn’t true and I think the “Think Tank” should be asked to provide hard statistical evidence with a large sample size for this claim, e.g. three months worth of monitoring by an independent group and not at the bottom of the solar cycle. It is my understanding that RM-11305’s claim of certain sub-bands being under-utilized is based on data accumulated during a recent two week period. We are currently in the trough of the solar sunspot cycle so naturally there will be decreased activity on the amateur radio service bands.

In summary, the “Think Tank” is composed of seven amateur radio licensees who purport to have the best interests of the entire amateur radio service community in mind. They feel that allowing their legal limit transmitters to wander all over the amateur bands with their AM wide band signals is somehow good for the rest of us.

I don't think so. Just like good fences make good neighbors, definitive band/mode allocations make for good communications.

Sincerely,

Steve Hewlett KB1NIV  
44 Winter Park Road  
Framingham, MA 01702